

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

EARL PARRIS, JR., individually, and	)	
On behalf of a Class of persons similarly	)	
Situated,	)	
Plaintiff,	)	
	)	
CITY OF SUMMERVILLE,	)	
GEORGIA,	)	
	)	
Intervenor-Plaintiff,	)	
	)	Civil Action No.:
vs.	)	4:21-CV-00040-TWT
	)	
3M COMPANY, DAIKIN AMERICA,	)	TRIAL BY JURY
INC., E.I. DU PONT DE NEMOURS	)	
AND COMPANY, HUNTSMAN	)	
INTERNATIONAL, LLC, PULCRA	)	
CHEMICALS, LLC, MOUNT	)	
VERNON MILLS, INC.,	)	
TOWN OF TRION, GEORGIA,	)	
	)	
Defendants.	)	

**TOWN OF TRION, GEORGIA’S JOINDER IN MOUNT VERNON MILLS,  
INC.’S RESPONSE TO PLAINTIFFS’ OBJECTION TO ASSERTION OF  
PRIVILEGE AND MOTION FOR *IN CAMERA* REVIEW**

COMES NOW, Defendant Town of Trion, Georgia (“Town of Trion”), by and through its undersigned counsel, and hereby joins Mount Vernon Mills, Inc.’s (“Mount Vernon’s”) Response to Plaintiffs’ Objection to Assertion of Privilege and Motion for *In Camera* Review (Dkt. 333). Town of Trion herein adopts and

incorporates, as if set forth fully herein, the relevant portions of the aforementioned response with respect to the nature of the communications between the Town of Trion and Mount Vernon, the assertion of the common interest/joint defense privilege, and the Town of Trion's efforts to claw back the inadvertently produced emails at issue.

Respectfully submitted, this 3rd day of February 2023.

**GORDON REES SCULLY  
MANSUKHANI, LLP**

By: /s/ Kimberly C. Sheridan

Kimberly Sheridan

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*Attorney for Defendant Town of Trion*

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VERNON MILLS, INC., )  
TOWN OF TRION, GEORGIA, )

TRIAL BY JURY

Defendants. )

**CERTIFICATE OF SERVICE**  
**AND COMPLIANCE WITH LOCAL RULE 5.1**

I hereby certify that I have this date electronically filed the within and foregoing Town of Trion Georgia's Joinder in Mount Vernon Mills, Inc.'s Response to Plaintiffs' Objection to Assertion of Privilege and Motion for *In Camera* Review with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record. Further, all pleadings were

prepared using Times New Roman 14-point font.

This 3rd day of February 2023.

By: /s/ Kimberly C. Sheridan

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